Shelter Support
Recordkeeping and Reporting Requirements

DHCD ESG Homelessness Prevention sub-recipients and any sub-contractors must comply with the following recordkeeping and reporting requirements to ensure compliance with the Emergency Solutions Grant Program Interim Rule and the DHCD RFR.

Category for Reporting	Required Documentation for Shelter Support (Individual and Non-EA Family Shelters)
1. Eligibility requirements	All Shelter Support recipients and sub-recipients must maintain documentation that they operate a low-threshold emergency shelter which will accept <u>any</u> homeless person or family* in need who can safely be admitted, without a requirement to participate in any program activities, provided that the individual or family agrees to: • Comply with basic safety shelter rules; and • Work with staff to develop and comply with a rapid re-housing plan. *ESG family shelters must not separate family members, including 18 year old male family members, upon admittance into the emergency shelter facility.
2. Services and Assistance Provided/Financial Records	DHCD ESG recipients and sub-recipients must keep a record of all costs charged to their Emergency Solutions Grant. Eligible shelter support operations costs are those costs associated with creating and/or operating new or unfunded emergency shelter beds or rooms for homeless individuals or families in high need areas. Eligible ESG costs include: • Maintenance • Insurance • Utilities • Rent • Program Supplies (mats, linens such as bedding, towels, etc.) • Repairs • Fuel • Food • Durable goods for use in temporary emergency shelters such as furniture, washers, dryers, refrigerators, and freezers.

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Services and Assistance Provided/Financial Records	Emergency shelters may spend up to 50% of their contract award, if approved by DHCD, on staff related costs. If staff position is not paid fully by ESG, there must be a record of the time (hourly) spent conducting ESG activities and the activities completed during that time.
3. Sub-recipients and sub-contractors	1. Recipients and sub-recipients must retain copies of all-solicitations of and agreements with sub-contractors, records of all payment requests by and dates of payments made to sub-contractors, and documentation of all monitoring and sanctions of sub-contractors, as applicable. 2. Recipients and sub-recipients must retain copies of all procurement contracts and documentation of compliance with the procurement requirements in 24 CFR 85.36 and 24 CFR 84.40–84.48. 3. Recipients and sub-recipients must ensure that its sub-recipients (sub-contractors) comply with the recordkeeping requirements specified by DHCD and HUD.
4. Centralized or Coordinated Assessment Systems and Procedures	ESG recipients and sub-recipients should be actively working with their CoC to implement a centralized and coordinated assessment system. Additionally, documentation and evidence of this process should be maintained. Once a centralized and coordinated assessment system has been implemented by the CoC, ESG recipients and sub-recipients must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD. Recipients and sub-recipients are required to work with other mainstream organizations and service providers to connect their program participants to available services across the Commonwealth. ESG services must be provided in close coordination with other services funded by the Commonwealth, including Rental Assistance for Families in Transition (RAFT) & HomeBase, to ensure that no household is left without the necessary resources to prevent homelessness.

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5. HMIS & DHCD Monthly Reporting Requirements	Active participation in a HUD approved HMIS is required of all successful respondents. Participation includes, but is not limited to, the collection and input of all universal and program level data elements, at a data quality rate of at least 90% and completeness (bed coverage/participant coverage) rate of 100%. Participation in a HUD approved HMIS will be documented by producing an Annual Performance Report. Additionally, recipients and sub-recipients are required to report universal and program level data elements on the whole shelter funded by ESG, not just those individuals directly receiving services that may be funded through ESG.
	Providers may opt to participate in the state's HMIS, ETO/ASIST or contract at their own expense with an alternate HUD recognized HMIS. An ESG Shelter Support contract with a lead agency and several sub-contractors are not required to enter into the same HMIS program. However, the lead agency is responsible for ensuring that the sub-contracted agency is entering their client data into an HMIS program and monitoring the data quality regardless of which HMIS the sub-contractor may be entering into.
	Respondents which use an HMIS other than ETO must agree to conduct regular data uploads to the state's HMIS. Respondents which use a different platform of ETO, other than ASIST must agree to sync their data. <u>If a sync agreement is not already in place between the responding agency and DHCD, an agreement must be signed prior to execution of a contract.</u>
	The only exception to the HMIS requirement is for organizations with a primary purpose of serving victims of domestic violence or providing legal services. Such organizations are excluded by HUD from HMIS participation. However, each such organization must collect and enter **all** HUD required data elements into a HMIS comparable database from which the organization can produce reports that meet all HUD and DHCD reporting requirements, including APR's.
	Each ESG funded emergency shelter is required to submit an Annual Performance Report for each shelter program funded through ESG at the end of the DHCD funded contract period. The APR will be due to Elisa Bresnahan by July 15th, 2014.

HMIS & DHCD Monthly Reporting Requirements	Additionally, recipients and sub-recipients are responsible for submitting a monthly report for each shelter program funded under their ESG contract. The monthly report is due to DHCD on the 10th of each month for the previous month (ex. Report for month of July is due to DHCD Aug. 10$^{th.}$) Each shelter program is responsible for tracking the following data elements in order to complete the monthly report: • # individuals engaged in case management services and working towards accessing housing and mainstream benefits • # of families engaged in case management services and working towards accessing housing and mainstream benefits • # of individuals that received a referral to an ESG funded RRH program (either DHCD or other Entitlement Community funded program) • # of families that received a referral to an ESG funded RRH program (either DHCD or other Entitlement Community funded program) • # of individuals & # of families which exited the shelter to permanent housing (this should be pulled from HMIS by running an APR for the reporting period)
6. Shelter and Housing standards	Sub-recipients and sub-contractors receiving ESG funds must document compliance with the shelter and housing standards listed below by providing a copy of the city/town occupancy permit, health inspection certificate, lead free certificate, and fire inspection certificate as required by law. • Structure and materials • Access • Space and security • Interior air quality • Water supply • Sanitary facilities • Thermal environment • Illumination and electricity • Food preparation • Sanitary conditions • Fire safety; a copy of the log of quarterly fire drills which shall include the date and time that each fire drill was held, must be maintained Lead Based Paint standards apply for all shelters serving families if the shelter was constructed before 1978 AND a child under 6 or a pregnant woman will live there.

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7. Confidentiality	1. Sub-recipients and its sub-contractors must develop and implement written procedures to ensure:
	(i) All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;
	(ii) The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and
	(iii) The address or location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the recipient or sub-recipient and consistent with state and local laws regarding privacy and obligations of confidentiality.
	2. The confidentiality procedures of the recipient and its sub-recipients must be in writing and must be maintained in accordance with this section.
	Additionally, a release of information must be collected for each recipient receiving services through an ESG funded shelter program.
	DHCD has provided a Draft Recipient/Sub-recipient Confidentiality Agreement which sub-recipients should use unless/until they have an alternate specific Confidentiality policy. If the sub-recipient has its own alternate policy, please send an electronic copy to: Elisa.Bresnahan@state.ma.us for review.
8. Codes of Conduct / Conflicts of Interest	The recipient and its sub-recipients must keep records to show compliance with HUD's organizational conflicts-of-interest requirements, a copy of the personal conflicts of interest policy or codes of conduct, and records supporting exceptions to the personal conflicts of interest prohibitions.
	DHCD has provided a Draft ESG Code of Conduct which includes a Conflict of Interest Policy which sub-recipients should use unless/until they have an alternate Code of Conduct/Conflict of Interest Policy. If the sub-recipient has its own alternate policy, please send an electronic copy to: Elisa.Bresnahan@state.ma.us for review.

9. Faith-based Activities	ESG sub-recipients and sub-contractors must document their compliance with the faith-based activities requirements under section 576.407 of the Interim Rule.
	• Religious organizations may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that the religious organization does not use direct ESG funds to support any inherently religious activities, such as worship, religious instruction, or proselytization
	• Faith-based organizations may use space in their facilities to provide ESG-funded services, without removing religious art, icons, scriptures, or other religious symbols.
	• Religious organizations that receive ESG funds shall not, in providing ESG assistance, discriminate against an individual or family on the basis of religion or religious belief
10. Other Federal Requirements	The recipient and its sub-recipients must document their compliance with the Federal requirements, as applicable, including:
	1. Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under Other Federal Requirements, including data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds and the affirmative outreach requirements.
	2. Records demonstrating compliance with the uniform administrative requirements in 24 CFR part 85 (for governments) and 24 CFR part 84 (for nonprofit organizations) of the Interim Rule.
	3. Records demonstrating compliance with the environmental review requirements, including flood insurance requirements.
	4. Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR part 87.
11. Period of record retention	Documentation of ESG records must be retained for 5 years after the expenditure of all funds from the grant under which the household was served. Copies made by scanning, photocopying, or similar methods may be substituted for the original records.